

PAB
FILE

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11/4/76
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November 3, 1976

Mr. G. Hemminghaus
GAF Corporation
9215 Riverview Drive
St. Louis, Missouri 63137

Dear Mr. Hemminghaus:

This is to inform you that Mr. William H. Longston, Environmental Protection Agency, (EPA), Region VII, inspected your facility on October 4, 1976, and determined that it is in compliance with EPA Regulation 40 CFR 61.22(c) under the terms of the Section 113 Order dated August 3, 1976.

Acceptance of this determination does not relieve GAF Corporation of any responsibility for continuing compliance with Air Pollution Control Regulations, including proper operation and maintenance of the pollution control equipment. There will be periodic inspections, by both the State and Environmental Protection Agency, to assure continued compliance with regulations.

If you have any questions, please contact me at 816/374-2576.

Sincerely yours,

Gale A. Wright, P.E.
Legal Branch
Enforcement Division

cc: Division of Environmental Quality, Jefferson City,
Missouri 65101

xc City of STL

07KF

30290599



Superfund

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4.2

bcc: W. A. Spratlin, SVAN
bcc: D. E. Durst, ARHM-ASUP

CONCURRENCES							
SYMBOL	▶ ENFC-LEGL						
SURNAME	▶ Hous						
DATE	▶ 11-3-76						

File:
GAF CORP - ASBESTOS CEILING TILE PLANT
ST. LOUIS, MO.

TELEPHONE CONVERSATION RECORD

DATE OF CALL: 3/29/77 TIME OF CALL: 9. M.
PERSON ASKED FOR: MJS PERSON CALLING: Jack Holloway
OFFICE AND/OR PHONE: GAF

New Jersey (201-628-3508)

SUBJECT: New Process Planned for St. Louis City.

DISCUSSION: Holloway said they were adding a new process to their existing facility in St. Louis. They currently have an asbestos cement mfg. plant (all info. filed under NESHAAPS). They are planning to install an independent process to manufacture polyurethane foam roof/deck insulation. He said there would be little in the way of particulate emissions but a higher level of gaseous emissions. He talked to the State, which referred him to St. Louis City. The City sent him an application form and suggested he talk to EPA about any Federal requirements. I told Mr. Holloway I was not aware of Federal standards that would apply. ~~He~~ We discussed the PSD and NSPS regs. and agreed this new facility did not appear to fall within any of the pertinent source categories. I told him he should deal directly with the local agency w.r.t. NSR.

October 15, 1976

NESHAPS INVESTIGATION

GAF Corporation
Building Products Division
9215 Riverview Drive
St. Louis, Missouri

4280-1008
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11/4/76
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A reinspection tour of this facility was made at 3 p.m. on October 4, 1976, by Richard Knapp, City of St. Louis, Division of Air Pollution Control, Department of Public Safety, and William H. Longston, Surveillance and Analysis Division, Environmental Protection Agency. The inspection tour was provided by William Neal, Personnel Manager and Safety Manager, and G. Robert Reed, Plant Engineer.

The original inspection of this facility was made on February 4, 1976. See the report dated February 23, 1976, for process details. Many parts of the process were not in operation at that date and a reinspection was made on June 8, 1976. See the report dated July 17, 1976. This report concluded that the main baghouse system was in violation of the hazardous air pollution regulation [40 CFR 61.22 (c)]. It was recommended that appropriate action consistent with that violation be taken. An order to that effect dated August 3, 1976, was issued.

By a letter, dated August 30, 1976, GAF Corporation informed this agency that compliance would be achieved by September 15, 1976.

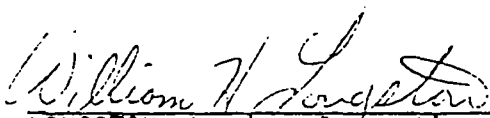
This reinspection of the main baghouse was for the purpose of final compliance determination.

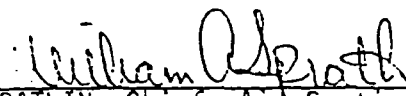
Discussion of Compliance Status

At the time of this inspection both process lines were in full operation, the scrap pulverizer was in operation and the facility could be characterized as "in full operation." No visible emissions could be observed from this operation. It was, therefore, determined that this process was in compliance with 40 CFR 61.22 (c).

Recommendation

It is recommended that no further action be taken as a result of this inspection and that GAF Corporation be informed of their compliance status.


LONGSTON, Leader, Inspection Unit


SPRATLIN, Chief, Air Section

G A F Corporation

Corporate Environmental Engineering Department
1361 Alps Road
Wayne, New Jersey 07470
Telephone (201) 628-3501



*File
GAF Corp. - ASBESTOS CEMENT PIPE
St. Louis.*

September 13, 1976

SEP 13 3 35 PM '76
F P A
REGIONAL OFFICE
KANSAS CITY, MO.

U. S. Environmental Protection Agency
1735 Baltimore Street
Kansas City, Missouri 64108

Attention Mr. Earl J. Stephenson
Director, Enforcement Division

Reference: GAF Corporation, St. Louis, Mo. Plant
Order Dated August 3, 1976 for Compliance
with Clean Air Act

Gentlemen:

GAF is in compliance with 40 CFR 61.22 (c)(2), as ordered. Replacement of the baghouse filter tubes was completed, and there are no visible emissions from the collector. Compliance will be maintained by means of weekly internal inspections and the prompt repair or replacement of any element in the collector found to be defective.

Very truly yours,

GAF CORPORATION

H. J. Holloway
H. J. Holloway

cc: Missouri Air Conservation Commission
Mr. G. G. Hemminghaus

X - Copy to W. Sprattlin. 9-16-76

GAF Corporation

Corporate Environmental Engineering Department
1361 Alps Road
Wayne, New Jersey 07470
Telephone (201) 628-3501



August 30, 1976

4280-1008

U. S. Environmental Protection Agency
1735 Baltimore Street
Kansas City, Missouri 64108

Attention Mr. Earl J. Stephenson, Director, Enforcement Division

Reference: GAF Corporation, St. Louis, Mo. Plant
Order Dated August 3, 1976 for
Compliance with Clean Air Act

Gentlemen:

GAF will repair the existing baghouse and achieve compliance with 40 CFR 61.22 (c)(2) by September 15, 1976, as ordered.

Attached is a copy of an acknowledgment for the purchase of 720 filter tubes for the collector. According to the manufacturer, the permeability of the fabric does not exceed 20 cu. ft. per minute per square foot.

40% of the collector has already been re-bagged and the remainder of the bags will be replaced as soon as the new ones are received early in September. A quantity will be kept in stock for future replacement.

Additionally, we have purchased a Visolite Leak Detector System from Baghouse Accessories Co. division of Standard Havens, Inc. Used for internal inspections of baghouses, the system is effective in revealing the location of any leaks.

Very truly yours,

GAF CORPORATION

H. J. Holloway

H. J. Holloway

cc: Missouri Air Conservation Commission
Mr. G. G. Hemminghaus

xc WA Spratlin - 9/3/76

RECEIVED
AUG 31 2 53 PM '76
F P A
REGIONAL OFFICE
KANSAS CITY MO.

INVOICE NO. 10-11-07632	SALES ORDER NO. 10-11-07632	DATE ORDERED 8-10-76	DATE ENTERED 8-10-76
TERMS CASH	TAX EXEMPT NO.		

OAF CORP
 9215 RIVERVIEW DR
 ST LOUIS MO 63137

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SHIP TO ADDRESS

SHIP 147 WK. 8-10-76, URGENTLY NEEDED. SHIP BAL. WK. 9-5-76.

DESCRIPTION	(BRAND)	QUANTITY	UNIT	PRICE
FILTER TUBES FOR WHEELABRATOR COLLECTOR CLOTH 1712-194 5" DIA. X 9'4" LONG (LOOP TOP)		720	EA	
SALES TAX				

ACKNOWLEDGEMENT

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 3, 1976

Mr. G. Hemminghaus
GAF Corporation
9215 Riverview Drive
St. Louis, Missouri 63137

Dear Mr. Hemminghaus:

Pursuant to Section 113(a)(3) of the Clean Air Act, as amended (42 U. S. C. 1857c-8), enclosed is an Order issued this date containing a schedule to achieve compliance with the Clean Air Act. Any violation of the terms of this Order would subject GAF Corporation to a civil action for appropriate relief under Section 113(b). In addition, Section 113(c) provides for criminal penalties for violations of an Order.

If you have any questions, please contact Mr. Henry F. Rompage, Attorney, Division of Enforcement, Environmental Protection Agency, Region VII, Kansas City, Missouri, at 816-374-2576.

Sincerely yours,

Earl J. Stephenson
Director
Enforcement Division

Enclosure

cc: Mr. Michael T. Marshall
Missouri Air Conservation Commission

bcc: Mr. William F. Johnson, Acting Director, Division of Stationary
Mr. Robert L. Markey, Director, Air and Hazardous Materials Division
Mr. James L. Wilson, Department of Natural Resources
Ms. Patsy Burrell

-----ENFC-LEGL:HFROMPAGE:ne:8-3-76:x2576

CONCURRENCES							
SYMBOL	▶ <i>Egfr Lyle</i>						
SURNAME	▶ <i>Rompage H.M.</i>	<i>EF</i>					
DATE	▶ <i>8-3-76</i>	<i>EF</i>					